



THOMAS AMBROSIO  
ATTORNEY AT LAW

Member of NJ & NY Bars

January 20, 2016

Via ECF

Robert Frazer  
Assistant United States Attorney  
District of New Jersey  
970 Broad Street, Suite 700  
Newark, NJ 07102

Re: USA vs. Farad Roland  
Crim. No. 12-298 (ES)  
Discovery Request – Pursuant to Rule 16, *Brady vs. Maryland*

Dear Mr. Frazer:

Based upon our ongoing review of the discovery and trial preparation of this case we hereby make the following additional discovery request pursuant to Rule 16 and *Brady vs. Maryland* :

1. Complete ballistics reports, including all diagrams created and all microscopic photographs taken in connection with any forensic examination of related to any shooting and/or homicide mentioned in the indictment. **(A review of the discovery provided to date establishes that the government has not provided any microscopic photographs or**

**ballistics examiner diagrams for any homicide or shooting mentioned in the indictment)**

2. All police reports and all medical records related to the alleged October 19, 2007 shooting of "L.M." by "Commando" as referenced on page 23, paragraph w. of the Second Superseding Indictment.
3. All police reports and all medical records related to the alleged June 18, 2008 shooting of "I.A." by Farad Roland as referenced on page 28, paragraph bbb. of the Second Superseding Indictment.

The Government's cooperation in compiling and turning over the above requested discovery appreciated. If any of the requested documentation has already been turned over to the defense then kindly advise me of the bates stamp numbers for any such document. Any request for discovery already turned over is inadvertent on my part due to the large volume of discovery connected with this case.

Very truly yours,

*/s/Thomas Ambrosio /s/Richard Jasper*

*/s/ Michael Bachrach*

Thomas Ambrosio

Richard Jasper

Michael Bachrach

cc: AUSA Courtney Howard  
AUSA Robert Feitel